

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MILBERT WATERS,	)	
	)	
Plaintiff,	)	Case No. 18-cv-5377
	)	
vs.	)	Honorable Gary Feinerman
	)	
CITY OF JOLIET, and JOLIET POLICE	)	Mag. Judge M. David Weisman
OFFICERS CROWLEY, Star #198, and	)	
ARELLANO, Star # 288,	)	JURY TRIAL DEMANDED
	)	
Defendants.	)	

**DEFENDANTS' AGREED MOTION FOR  
EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS**

NOW COMES the Defendants, CITY OF JOLIET, OFFICER CROWLEY AND OFFICER ARELLANO, by and through their attorney, MICHAEL D. BERSANI of HERVAS, CONDON & BERSANI, P.C., and move this Honorable Court for entry of an order granting the Defendants additional time to file their answer or otherwise respond to the Plaintiff's complaint to November 23, 2018.

In support thereof, Defendants state the following unto this Honorable Court:

1. Plaintiff Milbert Waters filed a complaint on August 7, 2018 against Defendants, City of Joliet and Officers Crowley and Arellano (hereinafter "Defendants").
2. On October 3, 2018, Michael Bersani of the law firm of Hervas, Condon & Bersani, P.C. was retained to defend the Defendants.
3. The City of Joliet was served with summons on October 3, 2018. Responsive pleadings were due on October 24, 2018.
4. The undersigned needs additional time to conduct a thorough investigation of the allegations of the complaint and file the appropriate responsive pleadings.

5. An extension of time will not incur any prejudice on behalf of the Plaintiff as the result of the granting of this motion.

6. Plaintiff's counsel, Brandon Brown, has no objection to this motion.

7. In light of the above, Defendants respectfully request that this Honorable Court allow until November 23, 2018, in which to file responsive pleadings to the Plaintiff's complaint.

WHEREFORE, the Defendants, CITY OF JOLIET, OFFICER CROWLEY AND OFFICER ARELLANO, respectfully request that this Honorable Court grant its motion for an extension of time in which to file its answer or otherwise respond to Plaintiff's complaint to November 23, 2018.

**s/ Michael D. Bersani**

MICHAEL D. BERSANI, ARDC No. 06200897

*One of the attorneys for Defendants*

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 12, 2018, I electronically filed the foregoing ***Defendants' Agreed Motion for Extension of Time to File Responsive Pleadings*** with the Clerk of the U.S. District Court for the Northern District of Illinois, Eastern Division, using the CM/ECF system which will send notification of such filing to the following CM/ECF participants:

**TO:** Brandon Eric Brown Jr., Law Office of Brandon Brown, 716 E. 47<sup>th</sup> Street, Chicago, IL 60653, (773) 624-8366, [bbrown@thebrownlaw.com](mailto:bbrown@thebrownlaw.com)

**s/ Michael D. Bersani**

MICHAEL D. BERSANI, ARDC No. 06200897

*One of the attorneys for Defendants*

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